

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA

PLAINTIFF

v.

KRYSTAL PERRY

DEFENDANT

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CR. NO. 2:13-CR-20203-JPM

**UNITED STATES SUBSTANTIAL ASSISTANCE MOTION
ON BEHALF OF KRYSTAL PERRY**

Comes now the United States by and through counsel Lawrence J. Laurenzi, Assistant United States Attorney for the Western District of Tennessee, and respectfully makes this Motion under Section 5K1.1 of the United States Sentencing Guidelines to allow the Court to go below the recommended guideline range. The United States makes this motion based upon Krystal Perry's substantial assistance to the United States in the prosecution of others. In support of its Motion, the United States would show that Ms. Perry admitted her involvement and the involvement of others in the sex trafficking of minors. The United States would show that she provided this information to the United States and her anticipated testimony was disclosed to her co-defendant, Derrick Eddins. Her co-defendant subsequently entered a guilty plea to the charge of conspiracy to commit sex trafficking. Her cooperation included meeting with law enforcement officials and disclosing her involvement and the involvement of her co-defendant as well as agreeing to testify had this matter gone to trial.

The United States submits that the information derived from Krystal Perry provided substantial assistance in the prosecution of others. Based upon the foregoing, the United States respectfully moves this Honorable Court to grant this 5K1.1 Motion and sentence Ms. Perry to a period of incarceration below the guideline range set forth in her presentence report.

RESPECTFULLY SUBMITTED,

EDWARD L. STANTON III
UNITED STATES ATTORNEY

BY: /s/ LAWRENCE J. LAURENZI
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Certificate of Service

I, Lawrence J. Laurenzi, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing **United States Substantial Assistance Motion on Behalf of Krystal Perry** was forwarded to Tyron Paylor, counsel for the defendant, by the Court's Electronic Filing System.

This 9th day of July 2014.

/s/ LAWRENCE J. LAURENZI
ASSISTANT UNITED STATES ATTORNEY